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June 20, 2006

By Telecopier & U.S. First-Class Mail Delivery

Thomas J. Krueger, Esq.
Associate Regional Counsel
United States Environmental Protection Agency
Regions 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

**Re: Ellsworth Industrial Park
Downers Grove, Illinois**

Dear Mr. Krueger:

I am assisting Joseph Strubbe of my office in certain matters concerning the operations of our client, Bison Gear & Engineering Corporation, in the Ellsworth Industrial Park ("IEP") in Downers Grove, Illinois.

Bruce White forwarded to us your letter to Mr. White dated June 12, 2006, in which you request that each of the "Settling Respondents" produce to you by June 23rd various documents related to their respective operations in IEP. Due to the extensiveness of your request, coupled with the fact that we have been and still are occupied by extensive discovery in the IEP litigation titled Muniz v. Rexnord, I am writing on behalf of Bison Gear to request a brief two-week extension to July 7 to respond to your request.

If I do not hear from you, we will assume that you are amenable to this request and we will issue our response by July 7. Thank you for your consideration in this matter.

Very truly yours,

VEDDER PRICE KAUFMAN & KAMMHOLZ, P.C.



Bruce C. Nelson

BCN/jj

cc: Mr. Mazin Enwiya, U.S. EPA
A. Bruce White, Esq. (by fax)
Joseph A. Strubbe, Esq.

EPA Region 5 Records Ctr.



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JUN 22 2006

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